

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

UNITED STATES

v.

BARON CUNNINGHAM

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Case No.: 08-00215-DKC

**MOTION FOR LEAVE TO LATE-FILE OBJECTIONS TO GOVERNMENT'S
PROPOSED JURY INSTRUCTIONS**

COMES NOW, the Defendant herein, Baron Cunningham, through counsel, Michael E. Lawlor and Andrew R. Szekely, Lawlor & Englert, LLC, and hereby moves this Court for leave to file the accompanying Objections to Government's Proposed Jury Instructions out of time and in support of the Motion states as follows:

1. Per prior Order of Court, Defendant's Objections were to be filed on November 24, 2009.

2. Undersigned counsel was unable to file the attached motions by the due date of November 23, 2009 due Mr. Lawlor's wife having given birth on Thursday, November 19, 2009.

WHEREFORE, for the foregoing reasons, Defendant, respectfully requests this Honorable Court to grant him leave to Objections to Government's Proposed Jury Instructions out of time.

Respectfully submitted,

/s/

Michael E. Lawlor
Andrew R. Szekely
Lawlor & Englert, LLC
6305 Ivy Lane
Suite 608
Greenbelt, Maryland 20770
301.474.3404

CERTIFICATE OF SERVICE

I hereby certify that on this November 25, 2009, a copy of the foregoing was delivered via ECF to the Office of the United States Attorney, 6500 Cherrywood Lane, Suite 400, Greenbelt, MD 20770.

_____/s/_____
Andrew R. Szekely